

EPNG Line No. 1903 Project

*Storm Water Pollution Prevention
Plan*

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[Attachment D: Report Form for Inspections](#)

STORM WATER POLLUTION PREVENTION PLAN

1. INTRODUCTION

This Storm Water Pollution Prevention Plan (SWPPP) has been prepared to comply with the provisions of the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges From Construction Activities (U.S. Environmental Protection Agency [USEPA], February 17, 1998). This plan presents the means for controlling the off-site discharge of pollutants associated with storm water discharges. Construction activities involve the conversion of the former All American 30-inch crude oil pipeline to a natural gas transportation pipeline owned and operated by El Paso Natural Gas (EPNG). A general location map of the pipeline is presented in Attachment A.

The project is located in the states of California and Arizona. The state of Arizona does not have authorization from the USEPA to regulate storm water discharges from construction activities. The USEPA administers the program in Arizona under the general permit dated February 17, 1998. The state of California does have authorization from the USEPA to regulate storm water discharges from construction activities.

In general, best management practices to control erosion and sedimentation will be utilized during construction to minimize impacts resulting from construction activities. EPNG's objective is to minimize the potential for erosion and sedimentation during pipeline conversion activities, and to effectively restore the right-of-way (ROW) and other disturbed areas. The measures described in this plan are intended to prevent discharge of pollutants during construction activities. EPNG will meet these objectives by employing the erosion and sediment control measures set forth in this plan. Because of the number of different work locations and variability in the terrain, it is not practical to develop site-specific plans and sediment controls for each area of the ROW. Instead, this plan presents typical structural and non-structural erosion and sediment control measures and management practices that will be implemented during construction activities. The erosion and sediment control measures described in this plan will serve as minimum standards during construction. In general, the measures are designed to minimize erosion and sedimentation by:

- Minimizing the quantity and duration of soil exposure;
- Protecting critical areas during construction by reducing the velocity of run-off and redirecting runoff away from disturbed areas of the ROW;
- Installing and maintaining erosion and sediment control measures during construction;
- Re-establishing vegetation as soon as possible following final grading; and
- Inspecting the ROW and maintaining erosion and sediment controls as necessary until final stabilization and revegetation is achieved.

Environmental Inspectors (EIs) will be responsible for ensuring that contractors implement and maintain erosion and sediment control measures during construction. This plan and a copy of the Notice of Intent will be kept at all of the construction sites (if practical) or at the nearest

contractor office or trailer. This plan will be available to a responsible agency representative upon request.

All personnel involved in the project will attend an environmental training program that will include a discussion on general erosion and sediment control requirements, proper clearing and grading methods, and the importance of protecting sensitive resources on the project. Crews specializing in erosion control tasks will be given additional training on proper installation and maintenance of erosion and sediment control measures.

To be eligible under the NPDES general permits for storm water discharges from construction activities, an applicant must certify that storm water discharge will not adversely affect threatened and endangered species. In this Plan of Development, the Threatened and Endangered Species Consultation and Summary provides a review of the completed and ongoing threatened and endangered species consultations with various agencies for this project. Storm water discharges from this project are not expected to have adverse effects to threatened and endangered species.

The NPDES general permits for storm water discharges from construction activities have removed the requirements for review of historic preservation issues. Rather the USEPA is conducting consultations on a case-by-case basis. However, since the EPNG Line No. 1903/1904 Project is being conducted under the jurisdiction of the Federal Energy Regulatory Commission (FERC), a historic preservation review has been conducted. The review activities are summarized in Resource Report 4, Cultural Resources, in EPNG's application that will be submitted to FERC. The report documents the surveys and consultations that were conducted and were ongoing as of the date of the report as required by FERC and the National Historic Preservation Act.

Additional materials to accompany this plan are included in the following attachments:

- Attachment A – Location Map
- Attachment B – Typical Drawings
- Attachment C - Notice of Termination
- Attachment D - Report Form for Inspections

2. CONSTRUCTION ACTIVITIES

Construction activities for the Line No. 1903/1904 Project involve the conversion of a segment of the All American Pipeline 30-inch diameter crude oil pipeline to a natural gas transportation pipeline. EPNG is the owner and operator of the pipeline. The Line No. 1903/1904 Project consists of conversion activities along approximately 303.5 miles of the former crude oil pipeline between Ehrenburg, Arizona, and Bakersfield, California. The construction activities are scheduled to begin in February 2003 with expected completion by June 2004.

Pipeline conversion will include a number of activities, some of which will not result in disturbance of soil. However, other activities will involve ground disturbance and are subject to the provisions of the General Permit. Those activities are listed below:

- Removal of pig launchers and receivers
- Pipeline replacements at former pump station sites
- Pipeline replacements required by U.S. Department of Transportation Class Changes

- Pipeline replacements at valve removal sites
- Pipeline tie-ins and interconnects
- Tie-ins at existing compressor stations
- Existing valve modifications
- New valve installation
- Removal of vent valves and plugging pipe
- Hydrostatic testing

The work may involve clearing and grading, excavation, pipe laying or other activities, backfilling, cleanup and restoration. The actual activities conducted at any given site will depend on the specific conversion related activity.

This plan does not address specific procedures and controls for crossing wetlands or perennial waterbodies because no wetlands or perennial waterbodies have been identified at construction locations. Nevertheless, general information regarding erosion and sediment control for streams and wetlands is provided in this plan.

All disturbed areas will be returned to pre-construction contours, as near as practicable and stabilized, as appropriate. Thus, the only changes expected to occur in regards to storm water runoff, will be temporary soil disturbances created during construction.

Because of the geographically dispersed nature of the project and variety of topographic settings, runoff coefficients for every construction location are not presented in this plan. The runoff coefficient values will vary significantly based on the various soil types that will be encountered. Construction reclamation efforts will return project-disturbed areas to pre-construction contours, and all project disturbances will be stabilized and revegetated. Therefore, there will be no appreciable difference between pre- and post-construction runoff coefficients. Soil types within the project area also vary significantly. Due to the arid climate, many of the soils encountered in the project area are susceptible to wind and water erosion.

Potentially hazardous materials that may be stored at construction sites could include diesel fuel, fuel oil, hydraulic oils, lubricants, and small amounts of other chemicals. These materials will be handled according to the provisions of the Spill Prevention Control and Countermeasure Plan (SPCC Plan). The SPCC Plan details how these materials will be stored and handled as well as containment, cleanup, and reporting procedures that will be followed in the event of a spill or release of these materials.

3. EROSION AND SEDIMENT CONTROL

3.1 General Measures

Temporary erosion and sediment control measures are designed to effectively reduce erosion and the transport of sediment, and to protect sensitive resources during construction. Temporary erosion control measures will be installed where needed immediately following significant soil disturbance and will be maintained throughout the course of construction. In general, temporary erosion control measures will be removed during cleanup activities after permanent erosion control measures have been installed. Permanent erosion control measures are designed to minimize erosion and sedimentation after construction until revegetation efforts have effectively stabilized the construction area. Attachment B contains typical drawings of

temporary erosion control devices discussed in this section (e.g., water bars, silt fences, staked bales).

The following general environmental protection measures will be implemented to minimize environmental impacts during construction and operation of the project:

- All personnel, vehicles, and equipment will stay in the designated construction areas. Access roads outside of the construction area will be designated by EPNG. All staking, flagging, and exclusion fencing will be respected.
- Construction, cleanup, and reclamation will be managed to minimize the time between grading, trench excavation, backfilling, and final restoration/reclamation.
- Temporary erosion/sediment control devices will be installed immediately after initial soil disturbance and will be maintained throughout construction and restoration, as necessary, until replaced by permanent erosion control measures.
- Permanent erosion control measures and final cleanup will be completed within 10 days after the trench is backfilled. If this schedule cannot be met, these activities will be completed as soon as possible. In no case will final cleanup be delayed beyond the end of the next recommended seeding season.
- A stockpile of erosion control materials, including straw bales, silt fence, and geotextile fabric, will be stored at the contractor yard during the entire period that construction disturbance occurs. Materials will be stored for planned use during construction, and sufficient additional quantities will be stored for maintenance and emergency use.
- Environmental Inspector(s) will verify compliance with the environmental requirements throughout construction.

The following temporary erosion and sediment control measures will be installed, where necessary during construction of the project.

3.1.1 Sediment Barriers

Temporary sediment barriers (e.g., straw bales, silt fence) are designed to reduce the velocity of water flow and intercept suspended sediment conveyed by sheet flow, while allowing runoff to continue down gradient. These installations are used to limit sediment transport out of the construction area. Temporary sediment barriers will be installed at the following locations immediately after initial ground disturbance:

- across the ROW at the base of slopes where the ROW crosses or is adjacent to paved roadways, drainages, wetlands (dry or wet), springs (dry or wet), impoundments (dry or wet), and other sensitive resources where the topography will direct sediment into these resource areas;
- around soil or spoil piles, where necessary (e.g., adjacent to flowing drainages); and
- where requested by the Environmental Inspector to prevent significant sediment transport off of the ROW or into adjacent resource areas.

3.1.1.1 General Requirements

Straw bale or silt fence sediment barriers will be placed at the bottom of slopes and will be located at least 6 feet from the toe of the slope, where possible, in order to increase ponding volume. The ends of the sediment barrier will be turned upslope to capture sediment.

Sediment barriers will be placed so as not to hinder construction activities and above the ordinary high water mark of active stream channels. If silt fences or straw bale sediment barriers are placed across the construction area, provisions will be made for traffic flow. A gap approximately 15-feet-wide, will be provided along the silt fence or straw bale row, with the ends of the sediment barrier turned slightly upslope. Across the gap, a driveable earth berm will be installed and maintained immediately upslope of the sediment barrier (upturned ends of the sediment barrier will tie into the driveable earth berm).

If sediment builds up to greater than 40 percent of barrier capacity, the sediment will be removed and spread on the disturbed ROW uphill of the sediment barrier. Damaged or undermined sediment control barriers will be repaired or replaced as described in this plan.

3.1.1.2 Straw Bales

Straw bale sediment barriers consist of a row of tightly abutted straw bales placed perpendicular to the runoff direction with the ends turned upslope. The barriers are typically one bale high, placed on the fiber-cut edge (ties not in contact with the ground) in a 4-inch-deep trench, and anchored securely with two wooden stakes driven through each bale. Soil will be placed and compacted along the toe of the uphill side of the straw bale barrier. If a trench cannot be excavated due to the presence of rocky material, the Contractor will install the straw bale so that the bale will not be undermined. A typical construction drawing has been included in Attachment B.

Only straw bales that are certified to be free of noxious weeds will be used. The Contractor will acquire weed-free straw and provide EPNG with the appropriate documentation.

3.1.1.3 Silt Fences

Silt fence composed of commercial filter fabrics with sufficient strength to prevent failure will be provided and installed by the Contractor. The height of the silt fence will not exceed 36 inches above the ground. The fabric will be cut from a continuous roll of fabric with splices only at the support posts. When splicing sections, at least a 6-inch overlap of fabric will be secured and wrapped to the post(s). Support posts will be a maximum of 10 feet apart.

The bottom edge of the silt fence will be installed in a trench excavated approximately 4 inches wide by 6 inches deep and refilled with compacted soil, unless on-site constraints dictate otherwise (e.g., rock). If a trench cannot be excavated, the Contractor will secure the bottom edge of the silt fence so that it will not be undermined. Silt fences will be attached to supporting posts by staples or wire. A typical construction drawing has been included in Attachment B. As determined by the Environmental Inspector, a wire fence may be used instead of wooden support posts to provide additional strength on hillsides.

3.1.1.4 Sandbags

Sandbags may be used as dikes or sediment barriers to control sediment in drainage swales. Sandbags can be strategically placed to control runoff, dissipate runoff energy, and catch sediment (i.e. as a “J” hook at the end of a waterbar).

3.1.2 Waterbars

Waterbars are utilized in various forms (e.g., rolling dips on access roads, driveable berms across travel ways, waterbars on slopes, etc.) during project construction and after final grade restoration. Waterbars are intended to intercept water traveling down a disturbed slope and divert water off disturbed soil into stable, well-vegetated, or adjacent rocky areas. A typical construction drawing has been included in Attachment B.

Waterbars will be installed near the base of slopes adjacent to wetlands and drainages, except at those specific sites (e.g., terrain slopes away from a canal) where, in the judgment of the Environmental Inspector, waterbars are not necessary to prevent discharge of sediment into sensitive resources. The general spacing for temporary and permanent waterbars is as follows:

- 300 feet for slopes of 5 to 15 percent
- 200 feet for slopes of 15 to 30 percent
- 100 feet for slopes greater than 30 percent

The Environmental Inspector can modify the final spacing of waterbars in the field.

Waterbar spacing is based on a site-specific evaluation of the ROW and standard construction protective measures. This spacing takes into account the soils, timing of construction, and area of disturbance anticipated for construction of the project. Except for site-specific situations as determined by the Environmental Inspector (e.g., extremely long slopes with highly erodible soils), waterbars will not be constructed on slopes with less than a 5 percent gradient.

Earthen waterbars will be constructed of existing suitable material and compacted to increase durability. Alternatives to waterbars may include a series of tightly abutted straw bales (constructed as per Section 3.1.1.2), excelsior logs, or abutted burlap bags filled with native soil. The installation angle will be 2 to 8 percent down slope (as measured by a hand-held clinometer or level) and will extend to, or slightly beyond, the edge of the disturbed construction area, but within the boundaries of the ROW. Any construction, including waterbar construction, beyond the boundary of the ROW requires a variance. However, if determined to be necessary by the Environmental Inspector, straw bales or silt fence may be installed at the end of the waterbar to direct the water further off the ROW.

Where possible, waterbars will discharge into stable, non-erosive (vegetated or rocky) receiving areas. In isolated instances where waterbars discharge into unstable or highly erosive areas without rock or vegetation, flow energy dissipators or “J-hook” shaped sediment barriers may be positioned at the waterbar outlet. Additionally, in highly erodible soils, the spacing between waterbars may be decreased to further slow the velocity of water. Whenever feasible, waterbars will be sited so that they do not outlet directly into sensitive resource areas (e.g., cultural sites, rare plant sites, drainages, waterbodies, wetlands, etc.).

The Contractor will regularly inspect and repair waterbars during construction to maintain their effectiveness. Waterbars worn down by heavy construction traffic or filled with sediments will be

repaired, as needed, and the sediment will be spread on the disturbed ROW uphill of the waterbar.

3.1.3 Check Dams

Where determined necessary by the Environmental Inspector, the Contractor will install check dams in bar ditches or other intermittent drainages to minimize the transport of sediment from the construction ROW. Check dams will be constructed of staked straw bales or stacked sand bags just inside the ROW edge. The center of the structure will be lower than the ends to channel water and create a sediment dump immediately upstream of the structure. The structure, and any deposited sediment, will be removed following final restoration of the site.

3.1.4 Surface Roughening

Surface roughening involves tracking of the ground surface with heavy machinery creating a series of shallow depressions running parallel to the ground surface contours. Surface roughening assists in controlling erosion by reducing the speed of storm water runoff, increasing infiltration, and trapping sediment.

3.2 Hazardous Materials Management

Care will be taken during construction to prevent the discharge of potential pollutants such as construction materials, petroleum products, debris, and sanitary wastes into Waters of the United States. Each contractor will maintain a SPCC Plan on site and will conduct activities according to their plan. Fueling of construction equipment will be restricted within 100 feet from streams or wetlands unless site conditions preclude this (i.e., steep slopes on which movement of equipment to fueling stations would create excessive disturbance). In these areas, special precautions may be implemented at the approval of the Environmental Inspector. In all cases, refueling will be conducted in accordance with the SPCC Plan. No storage of hazardous materials, chemicals, fuels, or lubricating oils will be allowed within 100 feet of stream and wetlands. Refueling will also be restricted within 200 feet of any known potable private water well and within 400 feet of any municipal or community water supply well. The Environmental Inspector will install "No Refueling" signs along the ROW in areas where refueling and maintenance of vehicles is restricted to warn construction workers of the restriction in the area.

3.3 Wetlands

No wetlands have been identified within the proposed construction areas. However, in the event any wetlands are encountered, EPNG will protect and minimize potential adverse impacts to wetlands by:

- Expediting construction in and around wetlands, and limiting the amount of equipment and mainline construction activities within wetlands to reduce disturbances of wetland soils;
- Restoring wetlands to their original configurations and contours;
- Permanently stabilizing upland areas near wetlands as soon as possible after completion of ground disturbing work; and

- Inspecting the ROW periodically during and after construction and repairing any erosion control or restoration features until vegetation is successfully established on the upland portions of the ROW.

3.4 Waterbodies

No perennial waterbodies have been identified within the proposed construction areas. However, in the event that waterbodies are encountered, EPNG will protect and minimize potential adverse impacts to waterbodies by the following protective measures:

- Expediting construction and limiting the amount of equipment and activities in waterbodies;
- Reducing clearing, leaving in place as many trees as possible on stream banks;
- Constructing waterbody crossings as perpendicular to the axis of the waterbody channel as engineering and routing conditions allow;
- Maintaining ambient downstream flow rates;
- Removing all construction material and structures from the waterbody after construction;
- Restoring stream channels and bottoms to their original configurations and contours;
- Permanently stabilizing stream banks and adjacent upland areas after construction; and
- Inspecting the ROW periodically during and after construction and repairing any erosion controls and/or performing restoration, as needed, in a timely manner.

4. CLEANUP AND RECLAMATION

4.1 Cleanup

After final installation of the pipeline, all disturbed portions of the construction area, including the ROW, access roads, and staging areas, will be returned to preconstruction grades and contours. Construction debris will be removed from the ROW and the ROW shall be graded and decompacted so that the soil is left in the proper condition for planting. Permanent water bars (constructed in the same manner as temporary waterbars) will be constructed after final grading and prior to seeding.

Every effort will be made to complete final cleanup and installation of permanent erosion control measures within 10 days after final backfilling is complete. If this schedule cannot be met, final cleanup will be completed as soon as possible. In no case will final cleanup be delayed beyond the end of the next recommended seeding season. Sediment barriers left in place after construction will be limited to earthen berms, waterbars, and diversion swales, although silt fence may be left in place in specific locations at the direction of the Environmental Inspector.

4.2 Reclamation

Reclamation, including alleviating soil compaction, final seedbed preparation, and revegetation, will occur immediately after final cleanup. Seeding may be postponed until conditions allow (e.g., time of year, soil moisture, or weather conditions). In no case will seeding be postponed past the next seeding season.

Reclamation and revegetation of the ROW incorporates permanent erosion and sediment control measures. However, if final restoration cannot occur in a timely manner due to weather or soil conditions, temporary erosion and sediment control measures will be employed until the weather is suitable for final cleanup and revegetation. In no case shall final cleanup be delayed beyond the end of the next recommended seeding season. If final reclamation or reseeding is delayed more than 30 days before the perennial vegetation seeding season, areas adjacent to waterbodies shall be mulched with 3 tons/acre of straw, or its equivalent, for a minimum of 100 feet on either side of the waterbody.

Wherever possible, sediment barriers left in place after construction will be limited to earthen berms, waterbars, and diversion swales, although silt fence may be left in place in specific locations at the direction of the Environmental Inspector.

4.3 Revegetation and Seeding

Following final recontouring of the ROW and installation of permanent erosion control measures, the ROW will be seeded with a seed mix that is appropriate for the local conditions. Due to the dispersed nature of this project, the Environmental Inspector, in conjunction with the landowner, will determine the specific revegetation requirements (including seed mixtures and soil amendments) for each site. The ROW will be seeded within 6 working days of final grading in accordance with recommended seeding dates, weather and soil conditions permitting. Slopes steeper than 3:1 will be seeded immediately after final grading in accordance with recommended seeding dates, weather permitting.

Prior to application of the seed, the seedbed will be prepared to depth of 3 to 4 inches using appropriate equipment to provide a firm, smooth seedbed that is free of debris. For broadcast and hydro-seeding, the seedbed will be scarified to ensure sites for seeds to lodge and germinate. The seed will be applied and covered uniformly per local soil conservation authorities recommendations for the seed mixture being applied. A range drill will be used on many of the disturbed sites, however, broadcast or hydro-seeding may also be used at double the recommended seeding rates. Where broadcast seeding is used, the area will be lightly raked or dragged with appropriate equipment after seeding to lightly cover the seeds.

Seed will be purchased in accordance with the Pure Live Seed specifications for seed mixes and used within 12 months of testing. Legume seed will be treated with a species-specific inoculate per manufacturer's specifications.

4.4 Mulching

Mulch, consisting of weed-free straw, wood fiber, or an approved equivalent, may be applied to disturbed soils to minimize the effects of wind or rain on exposed soils. During rainy conditions, mulch reduces the impact of rainfall in initiating erosion and slows the down slope velocity of surface flow.

4.4.1.1 Straw Mulch

An acceptable application of straw mulch will include the following:

- Straw mulch will be required in the following areas:
 - within 100 feet of flowing streams;
 - slopes of 30 to 40 percent with less than 70 percent surface cover; and
 - slopes of 0 to 30 percent with highly wind erodible soils and less than 70 percent surface cover, as directed by the Environmental Inspector or other qualified personnel.
- Straw mulch will be applied at a rate of 2,000 to 4,000 pounds (3,000 average) per acre, as directed by the Environmental Inspector. Mulch rates may be reduced or eliminated by the Environmental Inspector, where necessary.
- Only straw that is free of noxious weeds will be used. Written confirmation from an approved supplier will be required.
- Straw fiber length will be at least 8 inches long to facilitate crimping in place after application.
- Equipment specifically designed to crimp straw will be used to crimp straw fibers to a depth of 2 to 3 inches. Steep slopes inaccessible with a crimper will be crimped by tracking with tracked equipment running perpendicular to the slope. Farm discs will not be allowed for crimping.
- Acceptable straw mulch crimpers include:
 - mechanical crimper;
 - backhoe with crimper forks;
 - tracked equipment tracking up and down slopes (restricted to areas where other methods will not work); or
 - equivalent, as approved by the Environmental Inspector.
- If a straw mulch blower is used, strands of the mulching material will be at least 8 inches long to allow anchoring. Alternatively, organic liquid mulch binders may be used in accordance with the manufacturer's recommendations and with EPNG's approval.

If reclamation and seeding is deferred more than 10 days after final grade restoration, all disturbed slopes above waterbodies and wetlands will be temporarily stabilized by applying 3 tons of dry straw mulch per acre for a minimum distance of 100 feet above the edge of the waterbody or wetland.

After final restoration and seeding, mulch will be applied to all dry sandy sites, slopes greater than 8 percent, and all slopes within 100 feet of waterbodies to control erosion. Mulch will be spread over the area to a visible coverage of at least 75 percent of the ground surface and at a rate of 2 tons of dry straw (or functional equivalent) per acre.

4.5 Matting/Netting

Where determined necessary by the Environmental Inspector and/or Construction Inspector, erosion control matting will be installed along the stream banks of flowing streams and steep slopes (greater than 33 percent) after final grade restoration to reduce rain impacts on soils, to control erosion, and to stabilize steep slopes and waterbody banks.

The Contractor will use matting supplied in continuous rolls of 30 feet or greater with a minimum width of 4 feet. Staples will be made of wire, 0.09 inch in diameter or greater, and have a “U” shape with legs 8 inches in length and a 2-inch crown. Wire staples will be driven into the ground for the full length of the staple legs. Alternatively, wood pegs (0.5-inch-diameter) may be used to secure the erosion control fabric. In areas of active livestock grazing, protection measures other than fabric must be used.

Matting will be anchored, as it is unrolled to prevent stretching of the material and incomplete ground contact. For stream bank installations, mats will be laid parallel (upper mat overlapping lower mat in a shingle pattern) to the waterbody to a point above the top of the bank. Native materials (e.g., rocks, logs, etc.) may be used in conjunction with the matting to aid in bank stabilization.

During regular erosion control monitoring, erosion control matting will be inspected for washouts, adequate staking, and loss of matting. Damaged or undermined matting will be repaired or replaced, as necessary.

5. MAINTENANCE AND REPORTING

5.1 Inspection and Modifications

Throughout construction, the Contractor and the Environmental Inspector will inspect temporary erosion control structures as follows:

- daily in areas of active construction or equipment operation;
- on a weekly basis in areas with no construction or equipment operation; and
- in all areas of the ROW within 24 hours of each 0.5-inch or greater rainfall event, soil and weather conditions permitting.

The Environmental Inspector will document all erosion control inspections in the Environmental Daily Inspection Report (Attachment D). In the event of forecasted impending heavy precipitation, all temporary erosion control devices found needing repair or new installation will be repaired immediately. During this period, the Contractor will provide additional personnel, vehicles, and materials to repair erosion control structure damage where noted during the inspection.

Should structures clog, deteriorate, fail, be damaged, or require maintenance, the Contractor will conduct repairs or replacements within 24 hours after problems have been identified, weather and soil conditions permitting. Additionally, changes to the SWPPP will be made reflecting any corrective measures determined necessary during the inspection.

Sites that have been finally stabilized or where runoff is unlikely due to seasonal arid periods in arid areas (average 0 to 10 inches of rainfall) or semi-arid areas (average 10 to 20 inches), inspections will be conducted at least once every month until the ROW revegetates successfully. Inspections will take place until coverage under the permit is terminated.

Based upon the results of the inspection, this plan will be revised as needed within seven calendar days to address pollution sources identified and pollution prevention measures recommended. Any changes to this plan will be implemented before the next anticipated storm event or as soon as practicable following the inspection. A report summarizing the scope of the inspection, name(s) and qualifications of personnel making the inspection, the date(s) of the inspection, major observations relating to the implementation of this SWPPP and actions taken resulting from observation made during the inspection will be made and retained as part of the plan for at least 3 years following the date of the inspection.

5.2 Reporting

Any noncompliance or discharge that may seriously endanger health or the environment will be reported as soon as possible, but no later than 24 hours from the time EPNG first becomes aware of the circumstance. The report will be made to the appropriate agency in accordance with the SPCC Plan and will be made to the USEPA, Emergency Response Branch and the appropriate State Agency. In addition to verbal notification, a written submission to both the USEPA and the State Agency will be provided within 5 days of the time that EPNG becomes aware of the circumstances. The submission will contain the following:

- Description of the noncompliance and its cause;
- Period of noncompliance, including exact dates and times;
- Estimated time noncompliance is expected to continue, if it has not been corrected; and
- Steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.

6. NON-STORM WATER DISCHARGES

Hydrostatic testing will take place at selected places along the pipeline route. It is anticipated that hydrostatic test water discharges will take place at two primary discharge points in Arizona and California. Discharges of hydrostatic test water will be covered by the specific permits for such discharges as regulated by Arizona and California and water will be discharged to specially constructed lined pits or evaporation ponds. However, if additional hydrostatic test water discharge points are contemplated, appropriate permits will be obtained prior to conducting hydrostatic testing and discharge activities. Any test water discharges to land or water will use appropriate soil or sediment erosion control devices.

7. COMPLETION PROCEDURES

7.1 Notice of Termination

Following completion of construction activities and final stabilization of disturbed areas, a Notice of Termination (NOT) will be submitted to the USEPA at the address indicated on the NOT form

(Attachment C). In Arizona, the NOT will also be submitted to the Arizona Department of Environmental Quality (Arizona DEQ). In California, the NOT will be submitted to the Executive Officer of the Regional Water Board responsible for the area in which the facility is located. The mailing addresses is:

Storm Water Coordinator
Arizona DEQ
3033 North Central Avenue
Phoenix, AZ 85012

Central Valley Regional Water Quality Control Board
Attn: Executive Officer
3614 East Ashlan Avenue
Fresno, CA 93726

Lahontan Regional Water Quality Control Board
Attn: Executive Officer
2501 Lake Tahoe Blvd.
So. Lake Tahoe, CA 96150

The NOT serves as notification that coverage of storm water discharges associated with the construction activities under the general NPDES Permit have been terminated.

Final stabilization is defined as:

- "All soil disturbing activities have been completed and a uniform (e.g., evenly distributed, without large bare areas) perennial vegetative cover with a density of 70 percent of the native background vegetative cover for the area has been established on all unpaved areas not covered by permanent structures, or equivalent permanent stabilization measures (such as rip-rap, gabions, or geotextiles) have been employed."
- "In some parts of the country, background vegetation will cover less than 50 percent of the ground (i.e., arid areas). Establishing at least 70 percent of the native vegetation cover criteria for final stabilization (e.g., if the native vegetation covers 50 percent of the ground), 70 percent of the 50 percent would require 35 percent total cover for final stabilization. "

7.2 Long-term Storm Water Management

Following completion of construction activities, all disturbed areas will be stabilized either through revegetation or other appropriate measures, except for those areas which were cropland prior to construction and which are to be returned to crop production. After the construction areas are adequately stabilized and a NOT has been filed, no additional storm water management will be undertaken. There is no requirement for an operational NPDES Storm Water Permit for natural gas pipelines based on SIC Code 4922.

8. STORM WATER POLLUTION PREVENTION PLAN CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person

or persons who manage the systems, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name
Title
Company

Date

Attachment A: Location Map

INSERT
Location Map

Attachment B: Typical Drawings

INSERT
Typical Drawings

Attachment C: Notice of Termination

INSERT

Notice of Termination

Attachment D: Report Form for Inspections

INSERT

Report Form for Inspectors